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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

In Re:

ARCON CONSTRUCTION CORPORATION

, debtor

Case No. 24-30679

CHAPTER 11

Hearing Date:

Time:

Place: T

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Hon. Dennis Montali

**APPLICATION TO EMPLOY GEORGE WOLFF OF THE WOLFF LAW OFFICE**  
**AS SPECIAL COUNSEL**

This *Application to Employ George Wolff of the Wolff Law Office as Special Counsel*, filed by the Debtor-in-Possession of the above-captioned estate (the "Applicant"), pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. Proc. 2014, which entity respectfully represents:

1. The Professional is an attorney who has previously represented the Debtor. However, pursuant to 11 U.S.C. § 327(e), the proposed representation is in the best interest of the estate, and the Professional does not represent or hold any interest adverse to the Debtor or the estate with respect to the matter on which the Professional is to be employed.
2. The professional services to be rendered include:  
Preparation, filing and representation of Debtor in an Appeal of case CGC-19-574888, Superior Court of California, San Francisco.

1 3. Applicant desires to retain George Wolff because he is well-qualified to perform the services  
2 required, and he has agreed – at the request of the Debtor – to the principles governing  
3 professional persons in a bankruptcy case.

4 4. The proposed hourly rates of George Wolff of the Wolff Law Office are:

5 Senior Attorney: \$500/hour

6 Associate Attorney: \$350/hour

7 Paralegal: \$150/hour

8 5. To the best of Applicant's knowledge, based on the Declaration of George Wolff filed  
9 herewith, the principals and employees of that firm have no connections with the debtor,  
10 creditors or any other party in interest or their respective attorneys and accountants, the  
11 United States Trustee, or any person employed in the office of the United States Trustee  
12 and, therefore, represent no interest adverse to the estate or creditors with respect to the  
13 matters on which its services are to be used by the Debtor and the estate, other than what  
14 is disclosed in Wolff's declaration.

15 6. The Wolff Law Office has not agreed to share compensation with any entity or individual  
16 outside the Wolff Law Office.

17 7. A proposed form of order authorizing the employment of George Wolff of the Wolff Law Office  
18 is attached as Exhibit 1.

19  
20 WHEREFORE, Applicant prays for an Order authorizing the employment of George Wolff of the  
21 Wolff Law Office for the foregoing purposes.

22  
23 Dated: October 28, 2024

/s/ Eric J. Gravel  
Eric J. Gravel  
Counsel for Arcon Construction Co.

Exhibit 1 – Proposed Order

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**(PROPOSED) ORDER AUTHORIZING EMPLOYMENT OF SPECIAL COUNSEL**

The Court has considered Debtor's *Application to Employ George Wolff of the Wolff Law Firm as Special Counsel* (the "Application") and the Declaration of George Wolff in support thereof. The Court finds that George Wolff does not hold or represent any interest adverse to the estate in the matters on which it is to be employed, that George Wolff is disinterested, and that George Wolff's employment is in the best interest of the estate.

**IT IS ORDERED** that the Application is granted and the Debtor is authorized to employ George Wolff of the Wolff Law Firm under the terms and conditions set forth in the Application, pursuant to § 327(e) of the United States Bankruptcy Code, 11 U.S.C. § 101 *et seq.* The effective date of employment is October 28, 2024 – the date that the Debtor filed the

1 Application. The Court's Guidelines for Compensation and Expense Reimbursement of  
2 Professionals and Trustees will apply.

3 \*\*\*END OF ORDER\*\*\*  
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